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8 *Attorneys for Defendant Capital
 9 One Auto Finance, A Division of Capital One,
 10 N.A., erroneously sued as “Capital One
 11 Financial Corporation”*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 CARINA CORDERO,

15 Plaintiff,

16 v.

17 EXPERIAN INFORMATION SOLUTIONS,
 18 INC.; NATIONAL CONSUMER TELECOM &
 19 UTILITIES EXCHANGE, INC.; CLARITY
 20 SERVICES, INC.;
 21 BACKGROUNDCHECKS.COM LLC and
 22 CAPITAL ONE FINANCIAL CORPORATION

23 Defendants.

24 CASE NO.: 2:24-cv-00592-JCM-MDC

25 **STIPULATION AND ORDER TO EXTEND
 26 TIME FOR DEFENDANT CAPITAL ONE
 27 AUTO FINANCE, A DIVISION OF
 28 CAPITAL ONE, N.A. TO FILE
 29 RESPONSIVE PLEADING TO
 30 COMPLAINT**

31 **(FIRST REQUEST)**

32 Pursuant to Local Rules 6-1 and 6-2, Plaintiff Carina Cordero (“Plaintiff”) and Defendant
 33 Capital One Auto Finance, A Division of Capital One, N.A., erroneously sued as “Capital One
 34 Financial Corporation,” (“Capital One” and together with Plaintiff, the “Parties”) stipulate and
 35 agree as follows:

- 36 1. Capital One’s current deadline to file its responsive pleading to the Complaint is
 37 April 22, 2024;
- 38 2. Immediately upon being retained by Capital One, on the morning of April 18,
 39 2024, counsel for Capital One reached out to Plaintiff’s counsel to request additional time to file
 40 a responsive pleading;
- 41 3. The Parties agreed that good cause exists to extend the responsive pleading
 42 deadline by thirty (30) days to allow the newly engaged defense counsel to obtain and review a

1 copy of the file and gather additional facts and information while continuing to devote resources
2 to exploring the potential for early resolution of this matter; and

3 4. The Parties agree to extend the deadline for Capital One to file a responsive
4 pleading to the Complaint to May 22, 2024;

5 5. This stipulation is made in good faith and not for the purpose of delay.

6 **NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:**

7 Capital One's time to file a responsive pleading to Plaintiff's Complaint is extended.
8 Capital One shall file its responsive pleading on or before May 22, 2024.

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10 DATED this 19th day of April, 2024.

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12 McDONALD CARANO LLP

13 By: /s/ Karyna M. Armstrong
14 Aaron D. Shipley (NSBN 8258)
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16 *Attorneys for Defendant Capital One
Auto Finance, A Division of Capital One,
N.A.*

17 DATED this 19th day of April, 2024.

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19 FREEDOM LAW FIRM, LLC

20 By: /s/ Gerardo Avalos
21 George Haines (NSBN 9411)
Gerardo Avalos (NSBN 15171)
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23 *Attorneys for Plaintiff*

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IT IS SO ORDERED.
UNITED STATES MAGISTRATE JUDGE
DATED: 4-24-24